

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 1736.03
“REPORTING AND RECORDKEEPING REQUIREMENTS UNDER EPA’S
NATURAL GAS STAR PROGRAM”**

August 14, 2001

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This ICR is entitled "Reporting and Recordkeeping Requirements Under EPA's Natural Gas STAR Program," ICR number 1736.03.

1(b) Characterization of the Information Collection

Natural Gas STAR is a voluntary program sponsored by the U.S. Environmental Protection Agency (EPA) that encourages natural gas companies to adopt cost effective methods for reducing methane emissions. The program works with natural gas production, processing, storage, transmission, and distribution companies to remove barriers that inhibit the implementation of various emission reduction opportunities. The Program effectively advances the adoption of emission reduction technologies by working with Natural Gas Star Partners to evaluate a set of Best Management Practices (BMPs) and various Partner Reported Opportunities (PROs) in the context of their current business operations, and implement them where cost effective. The program's BMPs and PROs save participants money, improve operational efficiency, and enhance the protection of the environment.

Participation in the program begins with the completion and submittal of a one-page Memorandum of Understanding (MOU) that outlines responsibilities of the Natural Gas STAR Partner and EPA. The MOU commits a Natural Gas STAR Partner to reviewing all of its gas-related operations in the U.S. and considering a set of options that reduce emissions, increase profits and competitiveness, and maintain or enhance gas delivery service. In addition, Partners agree to implement BMPs that pertain to the Partner's operation (production, transmission, processing, storage, and/or distribution). Partners also agree that the BMPs are generally cost effective for the industry, but favorable economics are dependent upon site specific factors.

Natural Gas STAR Partners agree to submit an Implementation Plan within six to twelve months of signing the MOU. In subsequent years, Partners must complete and submit an Annual Report that documents the implementation of BMPs and PROs and associated methane emission reduction accomplishments. In return for their participation, Partners are allowed to advertise their membership and involvement in the program. EPA helps Partners with their communication efforts and also provides program implementation assistance by analyzing emerging technologies and developing workshops and training courses. This voluntary agreement can be terminated by the Natural Gas STAR Partner or EPA with no notice or penalties.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

EPA has developed this ICR to obtain authorization to collect information from Natural Gas STAR Partners. EPA needs to collect initial information in the MOU to formally establish participation in the Natural Gas STAR Program and to obtain general information on new Natural Gas STAR Partners. EPA uses information obtained in the MOU to identify and initiate communication with the Partner's Natural Gas STAR Implementation Manager and Media Liaison.

By agreeing to participate in the Natural Gas STAR Program, the Partner commits to completing and submitting an Implementation Plan and an Annual Report. The Implementation Plan and Annual Report are necessary to evaluate a Partner's progress and performance, and assess overall program results. The information provided in these communications also allows EPA to identify the equipment, systems, maintenance methods, and implementation

methods most commonly utilized, and to provide technical and other assistance to Partners in completing and enhancing their planned implementation of BMPs and PROs.

2(b) Practical Utility/Users of the Data

EPA uses information submitted in the MOU to update its database/tracking system containing information on current and potential Natural Gas STAR Partners. The database serves as a source of general information and a mailing list for both Partners and non-partner companies. EPA uses information submitted in the Implementation Plan and Annual Report to document the progress of companies and organizations in implementing the program and reducing methane emissions. EPA enters report information received from Partners into the tracking system. EPA also aggregates these data and prepares various progress reports. EPA uses these data to develop technical publications on specific economic emission reduction practices and case studies of successful implementation experiences. These documents serve to demonstrate to current and potential Partners the cost savings that can be realized through various equipment upgrades and maintenance activities, and to provide technical and implementation assistance.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

The information to be obtained under this ICR has not been collected by EPA or any other Federal agency.

3(b) Consultations

EPA has consulted with not more than nine Natural Gas STAR Partners to obtain their views on this method of data collection and has obtained their input on the burden estimate. Organizations consulted included:

- Great Lakes Gas Transmission Company;
- Baltimore Gas and Electric Company;
- El Paso Natural Gas Company;
- Bay State Gas Company;
- PECO Energy Company;
- ANR Pipeline Company;
- Enron; and
- Shell E & P Company.

3(c) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register on May 29, 2001,(66FR29125). No comments were received in response to the notice.

3(d) Effects of Less Frequent Collection

The development of an MOU and Implementation Plan are one-time information submittals from companies that voluntarily choose to become Partners in the Natural Gas STAR Program. Partners must also prepare and submit

an Annual Report while participating in the program. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program.

3(e) General Guidelines

None of these reporting or record keeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5.

3(f) Confidentiality

Participation in the Natural Gas STAR Program is voluntary. Natural Gas STAR Partners may designate information submitted under this ICR as confidential business information. EPA will treat all such information as confidential business information and will not make the company or agency-specific information collected under this ICR available to the general public.

3(g) Sensitive Questions

No questions of a sensitive nature are asked in the MOU, Implementation Plan, or the Annual Report.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

The following is a list of Standard Industrial Classification (SIC) codes and associated industries that may be affected by information collection requirements covered under this ICR:

1311	Crude Petroleum and Natural Gas
4922	Natural Gas Transmission
4923	Natural Gas Transmission and Distribution
4924	Natural Gas Distribution
4931	Electric and Other Services Combined
4932	Gas and Other Services Combined
4939	Combination Utilities, Not Elsewhere Classified

4(b) Information Requested

EPA's Natural Gas STAR Program specifies requirements for Partners. All Natural Gas STAR Partners must develop and submit a one-page Memorandum of Understanding (MOU) with the Agency upon agreeing to participate in the program. Partners also must complete and submit to EPA a Natural Gas STAR Program Implementation Plan within six months of signing the MOU. The Implementation Plan is an outline of what will happen over the next three years, and serves as a plan for the Partner to follow. Partners also submit an Annual Report to the Agency. The Annual Report documents what has been accomplished in the past year, using the Implementation Plan as a guideline for comparison.

Memorandum of Understanding

Natural Gas STAR Partners are required to develop and submit to EPA an MOU that describes the terms of participation in the program.

(i) Data items:

Partners must provide the following information in the MOU:

- ! The name, title, address, telephone and facsimile number, and e-mail address of a Natural Gas STAR Program Implementation Manager and a Media Liaison;
- ! The name, address, and telephone number of the Partners's CEO, President, or Chairman, if applicable;
- ! A camera-ready version of the Partner's logo, or other emblem;

(ii) Respondent activities:

In developing the MOU, Partners must perform the following activities:

- ! Receive and review the MOU;
- ! Gather information and fill out the MOU;
- ! Sign the MOU and submit it to EPA.

Implementation Plan

Partners must complete and submit a Natural Gas STAR Implementation Plan within six to twelve months of signing the MOU.

(i) Data items:

The Implementation Plan form requests the following information:

- ! General company information (e.g., company name and contact, position, address, SIC code, telephone and facsimile numbers, etc.);
- ! An Implementation Plan Summary; and
- ! Information on applicable Best Management Practices, which are reported by BMP type:
 - Directed Inspection and Maintenance at Surface Facilities;
 - Identification and Rehabilitation of Leaky Distribution Pipe;
 - Directed Inspection and Maintenance programs at Compressor Stations;
 - Use of Turbines at Compressor Stations for New Installations or When Retiring Reciprocating Engines;
 - Identification and Replacement of High Bleed Pneumatic Devices;

- Installation of Flash Tank Separators on Dehydrators;
- Replace Gas Pneumatics with Instrument Air Systems; and
- Implement Directed Inspection and Maintenance at Gas Plants and Booster Stations.

! Information on applicable Partner Reported Opportunities that the company chooses to evaluate and implement

(ii) Respondent activities:

Partners must conduct the following activities in preparing the Implementation Plan:

- ! Review the instructions;
- ! Gather the requested information and develop the Implementation Plan;
- ! Complete the form(s);
- ! Sign and submit the plan to EPA; and
- Update the plan, if necessary.

Annual Report

Partners must complete and submit a Natural Gas STAR Annual Report while participating in the program.

(i) Data items:

The Annual Report form requests the following information:

- ! General company information (e.g., company name and contact, position, address, period covered by report, SIC code, telephone and facsimile numbers, etc.);
- ! An Annual Report Summary; and
- ! Information on Best Management Practices executed, which are reported by BMP type:
 - Directed Inspection and Maintenance at Surface Facilities;
 - Identification and Rehabilitation of Leaky Distribution Pipe;
 - Directed Inspection and Maintenance programs at Compressor Stations;
 - Use of Turbines at Compressor Stations for New Installations or When Retiring Reciprocating Engines;
 - Identification and Replacement of High Bleed Pneumatic Devices;
 - Installation of Flash Tank Separators on Dehydrators;
 - Replace Gas Pneumatics with Instrument Air Systems; and
 - Implement Directed Inspection and Maintenance at Gas Plants and Booster Stations.
- ! Information on applicable Partner Reported Opportunities that the company chooses to evaluate and implement

(ii) Respondent activities:

Partners must conduct the following activities in preparing the Annual Report:

- ! Review the instructions;
- ! Gather the requested information for the initial report;
- ! Complete the initial form(s);
- ! Sign and date the initial report;
- ! Submit the initial report to EPA; and
- Prepare and submit a subsequent Annual Report.

Use of EPA-Developed Materials

EPA will loan certain materials to Natural Gas STAR Partner's for the purpose of publicizing the program. The Partner will reproduce and return the materials to the EPA within 30 days.

(i) Data items:

Partner may request camera-ready negatives, mechanicals, and other directly reproducible material for the creation of the following:

- ! Natural Gas STAR brochures;
- ! Natural Gas STAR briefs;
- ! Natural Gas STAR video; and
- ! Other Natural Gas STAR materials.

(ii) Respondent activities:

- ! Make a request to the EPA to borrow materials; and
- ! Return all borrowed materials within thirty (30) days of their receipt.

Additional Activities

During participation in the program, Partners may be required to notify EPA within two weeks of any change in Natural Gas STAR Program Implementation Manager responsibility.

(i) Data items:

Partner must provide EPA with the name of the new Implementation Manager.

(ii) Respondent activities:

- Notify EPA within two weeks of any change in Natural Gas STAR Implementation Manager responsibility.

5. THE INFORMATION COLLECTED--AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The Natural Gas STAR Program requires EPA to perform activities after a Partner submits the MOU, Implementation Plan, and Annual Report.

Memorandum of Understanding

EPA must perform the following activities following the submittal of an MOU:

- ! Review the MOU to ensure completeness and accuracy, and follow up, if necessary;
- ! Sign the MOU;
- ! Develop a cover letter;
- ! Copy the cover letters and MOUs;
- ! Send cover letter and original MOU back to Partner;
- ! File copies of cover letters and MOUs; and
- ! Enter MOU information into a database.

Implementation Plan

EPA must perform the following activities after the submittal of an Implementation Plan:

- ! Review the plan to ensure completeness and accuracy, and follow-up, if necessary;
- ! Make copies of the plan;
- ! File copies of the plan; and
- ! Enter information into a database.

Annual Report

EPA must perform the following activities after the submittal of an Annual report:

- ! Review the report to ensure completeness and accuracy, and follow-up, if necessary;
- ! Make copies of the report;

- ! File copies of the report; and
- ! Enter information into a database.

Use of EPA-Developed Materials

EPA may perform the following activities after the receiving a request for materials:

- ! Make record of request;
- ! Ship materials to the Partner; and
- ! Receive returned materials.

Additional Activities

EPA also may be required to perform the following additional activity:

- ! Enter any changes in Partner's information into a database (e.g., Implementation Manager's responsibility, size of facility, newsletter mailing list, etc.).

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses a state-of-the-art telephone system, personal computers, and applicable database and word processing software. In addition to traditional hard copy data collection methods, all information can be submitted to EPA electronically. EPA has created the capability for companies to submit Annual Reports through a password protected website or by e-mailing an electronic reporting form.

EPA ensures the accuracy and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the MOU, Implementation Plan, and Annual Reports into a database and aggregates data obtained from the Implementation Plan and Annual Reports to track the progress of Partners in reducing methane emissions.

5(c) Small Entity Flexibility

EPA expects that some Natural Gas STAR Partners may be small entities. EPA has designed its plan and electronic reporting forms to minimize respondent burden while obtaining sufficient and accurate information. In addition, the burden associated with the Natural Gas STAR Program is inherently reduced since the initial agreement to participate is voluntary.

5(d) Collection Schedule

EPA collects initial information in the MOU, which is completed and submitted by each Partner upon agreement to participate in the program. EPA collects information in the Implementation Plan six to twelve months after receiving a signed MOU. Each Spring, EPA collects information in the Annual Report to monitor emission reduction progress. Finally, EPA may collect other program information on a periodic basis or as the information is

submitted; these items include notification of changes in Implementation Manager responsibility, and notification of changes in a Partner's gas system.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

In order to obtain accurate hourly burden and cost estimates, EPA consulted with fewer than nine members of the affected universe and reviewed comments received during the comment period. Exhibit 1 presents the estimated annual respondent burden and costs for information collection activities associated with the Natural Gas STAR Program.

6(b) Estimating Respondent Costs

EPA estimates an average hourly labor rate (hourly rate plus overhead) of \$120 for legal staff, \$98 for managerial staff, \$69 for technical staff, and \$36 for clerical staff. In developing these estimates, EPA used U.S. Bureau of Labor Statistics data and consulted with Natural Gas STAR Partners. To develop respondent capital and O & M cost estimates, EPA consulted with members of the oil and gas industry. EPA believes that the capital or operations and maintenance costs of this program are not significant. The only O & M costs expected are for postage. A postage cost of \$3.00 is attributed to all activities involving the sending of materials to account for the use of trackable mail. Therefore, the total O&M costs are \$480.

6(c) Estimating Agency Burden and Costs

Exhibit 2 presents the estimated Agency burden hours and costs for the information collection activities associated with this ICR. EPA estimates an average hourly labor cost (labor plus overhead) of \$61.31 for legal staff, \$57.34 for managerial staff, \$42.03 for technical staff, and \$16.88 for clerical staff. To derive these estimates, EPA used the 2001 Federal Pay Schedule salary figures. For purposes of this ICR, EPA assigned staff the following government service levels:

-	Legal Staff	GS-15, Step 1
-	Managerial Staff	GS-14, Step 4
-	Technical Staff	GS-12, Step 5
-	Clerical Staff	GS-5, Step 1.

EXHIBIT 1: ESTIMATED ANNUAL RESPONDENT BURDEN AND COST											
INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity								Total Hours and Costs		
	Leg. \$119.90/ Hour	Mgr. \$97.90/ Hour	Tech. \$69.30/ Hour	Cler. \$36.30/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost	Respon. or Activities	Number of Total Hours/ Year	Total Cost/ Year
Memorandum of Understanding											
Receive and review the MOU	1.00	8.00	0.00	0.00	9.00	\$903	\$0	\$0	8	72	\$7,224
Gather information and fill out MOU data sheet	1.00	25.00	0.00	2.00	28.00	\$2,640	\$0	\$0	8	224	\$21,120
Sign and submit MOU to EPA	0.00	0.50	0.00	0.50	1.00	\$67	\$0	\$3	8	8	\$560
SUBTOTAL										304	\$28,904
Implementation Plan											
Review instructions	0.00	2.00	0.00	0.00	2.00	\$196	\$0	\$0	8	16	\$1,568
Gather information and develop the Implementation Plan	0.00	10.00	10.00	0.00	20.00	\$1,672	\$0	\$0	8	160	\$13,376
Complete the form(s)	0.00	1.00	0.00	1.00	2.00	\$134	\$0	\$0	8	16	\$1,072
Sign and submit plan to EPA	0.00	0.50	0.00	0.50	1.00	\$67	\$0	\$3	8	8	\$560
Update Implementation Plan, as necessary	0.00	6.50	4.00	1.50	12.00	\$968	\$0	\$3	27	324	\$26,217
SUBTOTAL										524	\$42,793
Annual Report											
Review instructions	0.00	7.00	0.00	0.00	7.00	\$685	\$0	\$0	8	56	\$5,480
Gather the requested information for the initial report	0.00	10.00	37.00	0.00	47.00	\$3,543	\$0	\$0	8	376	\$28,344
Complete the initial form(s)	0.00	4.00	0.00	1.00	5.00	\$428	\$0	\$0	8	40	\$3,424
Sign and submit the initial report to EPA	0.00	0.50	0.00	0.50	1.00	\$67	\$0	\$3	8	8	\$560
Prepare and submit a subsequent Annual Report	0.00	10.00	18.50	1.50	30.00	\$2,316	\$0	\$3	90	2,700	\$208,710
SUBTOTAL										3,180	\$246,518
Use of EPA Developed Materials											
Make request to EPA for materials	0.00	2.00	0.00	1.00	3.00	\$232	\$0	\$0	9	27	\$2,088
Return borrowed materials within 30 days	0.00	0.00	0.00	1.00	1.00	\$36	\$0	\$3	9	9	\$351
SUBTOTAL										36	\$2,439
Additional Activities											
Notify EPA within two weeks of any change in Natural Gas Star Implementation Manager responsibility	0.00	0.50	0.00	0.50	1.50	\$116	\$0	\$3	10	15	\$1,190
SUBTOTAL										15	\$1,190
TOTAL										4,059	\$321,844

EXHIBIT 2: ESTIMATED ANNUAL AGENCY BURDEN AND COST											
INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity								Total Hours and Costs		
	Leg. \$119.90/ Hour	Mgr. \$97.90/ Hour	Tech. \$69.30/ Hour	Cler. \$36.30/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost	Respon. or Activities	Number of Total Hours/ Year	Total Cost/ Year

To derive hourly estimates, EPA divided annual compensation estimates by 2,080, which is the number of hours in the Federal work-year. EPA then multiplied hourly rates by the standard government overhead factor of 1.6.

6(d) Estimating the Responsible Universe and Total Burden and Costs

Currently, there are 90 Natural Gas STAR Program Partners, and EPA anticipates that an average of eight new Partners will join the program annually. The average annual universe numbers are shown below in Table 1.

TABLE 1
Estimated Number of Program Partners in Fiscal Years 1998-2000

Type of Partner	Fiscal Year '01	Fiscal Year '02	Fiscal Year '03	Average
New Partners Enrolled	8	8	8	8
Total Program Partners	90	98	106	98

Memorandum of Understanding

Each potential Partner must complete and submit an MOU to participate in the program. EPA expects that eight new Partners will complete and submit an MOU each year.

Implementation Plan

Each Partner must complete and submit the Implementation Plan within six to twelve months of signing and submitting the MOU. Thus, the Agency expects that all eight new Partners will prepare and submit the Implementation Plan each year. Additionally, EPA estimates that each year, 30 percent of all existing Partners (27 facilities) will update the Implementation Plan and submit it to EPA.

Annual Report

All existing Partners must complete and submit an Annual Report. EPA estimates that completing the initial Annual Report will take approximately twice as long as subsequent reports. EPA also expects that the eight new Program Partners joining each year will complete and submit an initial report and all 90 other existing Partners (98 minus the eight new Partners) will complete and submit subsequent reports.

Use of EPA-Developed Materials

Each year, EPA estimates that 10 percent of all Partners will request the use of EPA-developed materials for promotional purposes. Thus, EPA estimates that nine Partners ($90 \times .1$) will request materials from EPA each year.

Additional Activities

EPA expects that some additional information submittals may be required of some Partners. EPA estimates that approximately 10 percent of all Partners experience changes in their Implementation Manager responsibilities each

year. Thus, EPA estimates that an average of ten Partners (98 x .1) will notify EPA of changes in Implementation Manager responsibilities

6(e) Bottom Line Burden Hours and Costs

Exhibits 1 and 2 show the aggregate annual burden and cost to respondents and the government, respectively, for the information collection activities covered under this ICR. The bottom line burden for respondents is approximately 4,059 hours per year with an annual cost of approximately \$321,844. The annual bottom line burden to the Agency is approximately 575 hours, at a cost of approximately \$21,590 per year. Over the three-year period covered by this ICR, EPA estimates the burden of the program to be 12,177 hours and \$965,532 for respondents, and 1,725 hours and \$64,770 for EPA.

6(f) Reasons for Change in Burden

The overall reporting burden for respondents has increased from the previous ICR. Burden hours increased from 3,692 to 4,059 hours per year and annual costs increased from \$268,669 to \$321,844. This change is largely the result of:

- Higher hourly labor rates due to inflation; and
- An increase in the number of program participants.

The increase, however, was tempered by a reduction in per activity estimates for the MOU and a revised estimate of the percentage of partners that will submit implementation plan revisions. The simplification of the MOU reduced respondent burden by an estimated 10 hours per respondent through the removal of several data items including company specific details (number of employees, SIC code, throughput or pipeline mileage) and names and addresses for the Natural Gas STAR mailing list. The percentage of partners expected to submit revised implementation plans was reduced from 50 to 30 percent based on an analysis of actual program activity since 1993.

6(g) Burden Statement

The average per facility reporting burden for information collection requirements associated with completing the MOU is estimated to be 3.06 hours. The burden estimate includes time to receive, review, complete, sign, and submit the MOU.

The average per facility reporting burden for information collection requirements associated with completing the Implementation Plan is estimated to be 5.3 hours. The burden estimate includes time to receive and review the plan form; gather the requested information; complete the form; sign and date the form; and submit the form to EPA.

The average per facility reporting burden for information collection requirements associated with completing the Annual Report for Program Partners is estimated to be 32.4 hours. The burden estimate includes time to receive and review the report form; gather the requested information; complete the form; sign and date the form; and submit the form to EPA.

The average per facility reporting burden for information collection requirements associated with requesting the use of EPA-Developed materials is estimated to be .4 hours. The burden estimate includes time to make the request to the EPA for the materials and to return the materials to the EPA within thirty days of receiving them.

For Natural Gas STAR Partners, the average per facility reporting burden for information collection requirements associated with additional activities is estimated to be .2 hours. The reporting burden includes time to notify EPA of changes in Natural Gas STAR Program Implementation Manager responsibility.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing a respondent burden, including through the use of automated collection techniques to Ms Susan Auby, Collection Strategies Division , (Mail Code 2822), Office of Environmental Information, United States Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460-0001; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Include EPA ICR number 1736.03 and OMB Control Number 2060-0328 in any correspondence.